

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
JOSEPH COLUCCI

Freedom Mortgage Corporation,
Movant

vs.

JOSEPH COLUCCI,
Debtor

Case No. 19-16972-amc
Chapter 13

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE
CORPORATION'S
MOTION TO ALLOW LOAN MODIFICAT (DE 43)**

The undersigned hereby certifies that, as of January 3, 2022, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Movant's Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before December 30, 2021

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: January 3, 2022

Respectfully submitted,

Brock & Scott, PLLC

/s/ Andrew Spivack
Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on January 3, 2022 to the following:

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Kenneth E. West, Bankruptcy Trustee
Chapter 13 Trustee
1234 Market Street - Suite 1813
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United States Trustee, US Trustee
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/s/ Andrew Spivack
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